Case 19-62357 Doc 15 Filed 12/20/19 Entered 12/20/19 16:46:43 Desc Main Document Page 1 of 4

## UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF VIRGINIA Lynchburg Division

IN RE:

JOHN T OSLER

KAREN L OSLER

Chapter 7

Case No. 19-62357-RBC

**Debtors** 

U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR LEHMAN XS TRUST MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-12N

Movant

v.

JOHN T OSLER 30170 CHURCH STREET TEMPERANCEVILLE, VA 23442

KAREN L OSLER 30170 CHURCH STREET TEMPERANCEVILLE, VA 23442 (Debtors)

W. STEPHEN SCOTT PO BOX 1312 CHARLOTTESVILLE, VA 22902 (Trustee)

Respondents

## MOTION TO EXTEND STAY

U.S. Bank National Association, as Trustee for Lehman XS Trust Mortgage Pass-Through Certificates, Series 2007-12N by undersigned counsel, respectfully moves this Honorable Court to extend the Automatic Stay and, as grounds therefore states as follows:

Daniel K. Eisenhauer, Esq., Bar # 85242 Heather D. McGivern, Esq., Bar # 91767 PO Box 2548 Leesburg, VA 20177 (703) 777-7101 Case 19-62357 Doc 15 Filed 12/20/19 Entered 12/20/19 16:46:43 Desc Main

Page 2 of 4 Document

1. On December 20, 2019, U.S. Bank National Association, as Trustee for Lehman

XS Trust Mortgage Pass-Through Certificates, Series 2007-12N mailed a Motion for Relief from

Automatic Stay.

2. That pursuant to Local Rule 9013-1 H, counsel conferred with debtor's counsel

and was unable to schedule a hearing date within 30 days following the filing of the Motion and

therefore requests that the automatic stay be extended until January 23, 2020 at 10:00 AM

WHEREFORE, the premises considered, U.S. Bank National Association, as Trustee for

Lehman XS Trust Mortgage Pass-Through Certificates, Series 2007-12N respectfully requests

that this Court enter an Order extending the automatic stay until January 23, 2020 and for such

other and further relief as this Court deems just and proper.

Date: December 20, 2019

Respectfully submitted,

/s/Daniel K. Eisenhauer

Daniel K. Eisenhauer, Bar #85242

Heather D. McGivern, Bar #91767

Orlans PC

PO Box 2548

Leesburg, VA 20177

(703) 777-7101

Attorneys for U.S. Bank National Association, as

Trustee for Lehman XS Trust Mortgage Pass-

Through Certificates, Series 2007-12N

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Case 19-62357 Doc 15 Filed 12/20/19 Entered 12/20/19 16:46:43 Desc Main Document Page 3 of 4

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Respondents

## **CERTIFICATE OF SERVICE**

The undersigned states that on December 20, 2019, copies of the foregoing Motion to Extend Automatic Stay and Proposed Order were filed with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

W. Stephen Scott PO Box 1312 Charlottesville, VA 22902 wsscott7trustee@earthlink.net Bankruptcy Trustee Case 19-62357 Doc 15 Filed 12/20/19 Entered 12/20/19 16:46:43 Desc Main Document Page 4 of 4

Larry L. Miller Miller Law Group, PC Jordan Building 485 Hillsdale Drive, Suite 341 Charlottesville, VA 22901 larry@millerlawgrouppc.com Debtors' Attorney

and I hereby certify that I have caused to be mailed by first class mail, postage prepaid, copies of the foregoing Motion to Extend Automatic Stay and Proposed Order to the following non-ECF participants:

John T Osler 30170 Church Street Temperanceville, VA 23442 *Debtor* 

Karen L Osler 30170 Church Street Temperanceville, VA 23442 *Debtor* 

/s/Daniel K. Eisenhauer
Daniel K. Eisenhauer, Esquire